

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JANE DOE
Plaintiff

VS.

EDINBURG CONSOLIDATED
INDEPENDENT SCHOOL DISTRICT
Defendant

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CIVIL ACTION NO. 7:19-CV-00309
(JURY REQUESTED)

**AGREED MOTION TO EXTEND TIME TO COMPLETE
AND EXTEND ALL REMAINING PRE-TRIAL DEADLINES AND SETTINGS-**

NOW COME Jane Doe and Edinburg Consolidated Independent School District, and through their respective attorneys, and file this Agreed Motion to Extend Time to Complete and Extend All Remaining Pre-Trial Deadlines and Settings and in support thereof would respectfully show unto the Court as follows:

PROCEDURAL BACKGROUND OF CASE AND BASIS FOR RELIEF REQUESTED

1. On August 10, 2020, this Court entered its Scheduling Order with a joint pre-trial order due December 2, 2020 and pre-trial conference set for December 9, 2020.
2. Plaintiff and Defendant have cooperatively engaged in written discovery and depositions, but require additional time to engage in mediation.
3. Mediation is scheduled in this case for December 3, 2020. Additionally, Defendant has a pending motion for summary judgment on file.
4. Plaintiff and Defendant agree that further time is necessary to adequately engage in mediation, to prepare this matter for trial if needed and to evaluate the need for potential motions

that may need to be filed before trial. The parties are in agreement to extend pre-trial motions deadlines and court settings for this matter should the Court be inclined to grant this motion.

5. The parties respectfully request that the Court extend all current deadlines and settings by a period of sixty (60) days.

6. This motion is not made for purposes of delay but in order that justice may be done. A genuine need for the extension of the Court's deadlines exists for the purpose of conducting mediation, the potential filing of motions and the preparation for trial.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendant jointly pray that the Court enter an order granting an extension of the All Remaining Pre-trial Motions and Settings for this case.

Signed on December 1, 2020.

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CERTIFICATE OF CONFERENCE

By the undersigned signature below, Plaintiff's counsel confirms that she has conferred with counsel for Defendant and can state that the parties are in agreement and this motion is unopposed.

/s/ Cornelia Brandfield-Harvey
Cornelia Brandfield-Harvey

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2020, pursuant to the Federal Rules of Civil Procedure, a true and correct copy of the above and foregoing document was served on each party to this action by Plaintiff's submission of this document to the U.S. District Court electronically to the DCECF system:

/s/ Cornelia Brandfield-Harvey
Cornelia Brandfield-Harvey